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*Attorneys for Plaintiffs Valley Health Systems, LLC,  
DVH Hospital Alliance, LLC and  
Summerlin Hospital Medical Center, LLC*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

VALLEY HEALTH SYSTEM, LLC, a Delaware  
Limited Liability company, DVH HOSPITAL  
ALLIANCE, LLC, a Delaware Limited Liability  
company, and SUMMERLIN HOSPITAL  
MEDICAL CENTER, LLC, a Delaware Limited  
Liability company,

Plaintiffs,

vs.

TRAVEL INSURANCE FACILITIES, PLC, a  
Foreign Corporation, UNION  
REISEVERSICHERUNG  
AKTIENGESELLSCHAFT, a Foreign  
Corporation,

Defendants.

CASE NO.: 2:22-cv-00365-DJA

**PLAINTIFF'S LOCAL RULE IA 6-1.  
FIRST MOTION FOR  
ENLARGEMENT OF TIME TO  
COMPLY WITH DEADLINE TO FILE  
VERIFIED PETITION AND  
DESIGNATION OF LOCAL  
COUNSEL**

**[FIRST REQUEST]**

COME NOW the Plaintiffs, Valley Health System, LLC, DVH Hospital Alliance, LLC, and  
Summerlin Hospital Medical Center, LLC, (collectively, "Plaintiffs"), by and through their

undersigned counsel, and, pursuant to Local Rule 6-1, hereby move this Honorable Court for an enlargement of time for Timothy M. Hartley, Esq. to file a Local Rule 11-2 Verified Petition To Practice in a Particular Case [First Request] and state as follows:

1. This is an action for collection of amounts owed by the Defendants as travel health insurers for international patients who received medical goods and services at Plaintiffs' medical facilities.

2. Timothy M. Hartley, Esq., who regularly practices in Fort Lauderdale, Florida and has represented Plaintiffs in other similar matters, seeks to be admitted Pro Hac Vice in this Court solely for the purposes of representing Plaintiffs in this action.

3. Mr. Hartley has been advised that due to the existence of an administrative matter stemming from his admission to The Kentucky Bar in 1991, such matter will cause a delay in the filing of his application in this Court for a brief period of time.

4. The aforementioned administrative matter is not a disciplinary action, but related to Mr. Hartley's inactive license status with The Kentucky Bar which occurred when Mr. Hartley moved from Kentucky to Florida in 1991.

5. This Motion is made in good faith and not for the purposes of harassment or delay.

6. This Motion is the first request for extension of time within which to file Mr. Hartley's Local Rule 11-2 Verified Petition To Practice in a Particular Case.

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WHEREFORE, for the foregoing reasons, Plaintiffs, Valley Health System, LLC, DVH Hospital Alliance, LLC, and Summerlin Hospital Medical Center, LLC, and Timothy M. Hartley, Esq. respectfully request an additional thirty (30) days through and including April 15, 2022, to file Timothy M. Hartley's Local Rule 11-2 Verified Petition To Practice in a Particular Case [First Request] in this action and for such other and further relief as the Court deems appropriate.

Dated this 14<sup>th</sup> Day of March, 2022.

**WILEY PETERSEN**

/s/ Jason M. Wiley

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Nevada Bar No. 09274

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*(pro hac vice forthcoming)*

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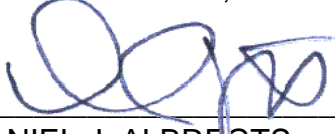
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**IT IS SO ORDERED.**

DATED: March 17, 2022



DANIEL J. ALBREGTS

UNITED STATES MAGISTRATE JUDGE

*Attorneys for Plaintiffs Valley Health Systems, LLC, DVH Hospital Alliance, LLC, and Summerlin Hospital Medical Center, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of Wiley Petersen, and that I served a true and correct copy of the foregoing **PLAINTIFF'S LOCAL RULE IA 6-1. FIRST MOTION FOR ENLARGEMENT OF TIME TO COMPLY WITH DEADLINE TO FILE VERIFIED PETITION AND DESIGNATION OF LOCAL COUNSEL [FIRST REQUEST]** on this 14th day of March, 2022, was electronically filed with the Clerk of the Court by using CM/ECF service which will provide copies to all counsel of record registered to receive CM/ECF notification.

/s/ Caitlin Pascal  
An employee of Wiley Petersen, counsel for Plaintiffs